

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FILE

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APR 22 1991

Federal Communications Commission
Office of the Secretary

In the Matter of

Revision of Part 97 of the Rules
Governing the Amateur Radio
Services Concerning Digital HF
Communications

To: The Commission

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RM-7681 APR 22 1991
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS TO PETITION FOR RULE MAKING

COMES NOW Jay W. Townsend, a lawful resident and citizen of the state of Washington and of the United States of America and interested party, and files these comments on the subject Petition for Rule Making and states as follows:

I. INTRODUCTION

1. Having first been licensed as an Amateur in the Amateur Radio Service by the Commission in 1967, am presently the holder of a license granting Amateur Extra class privileges.
2. I am very active on the amateur bands utilizing all modes of operation and specializing in digital communications. I am active in Military Amateur Radio Service as a traffic handler. I operate 24 hours per day in unattended packet mode on VHF frequencies.
3. I currently serve on the Amateur Radio Digital Committee a national committee formed in 1990 to represent views of amateurs across the nation on digital matters.
4. I am active in international amateur activities as well. I have handled and frequently receive third-party traffic handled via digital amateur means. Most of this activity takes place in the frequency bands currently subject of this petition. I also was a founding member of the U.S. Air Force Mars Packet Traffic System.

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5. Consequently, I possess first-hand knowledge and experience relative to the matter now before the Commission and respectfully request that my comments be given due consideration.

II. PETITION SPECIFICS

6. Before you is a petition filed by Robert C. Rogers N8FAU, Donald LeBrenz II WB8I, and George Schemm N8JAT requesting changes in the rules to allow amateur stations to be operated under automatic control transmitting packet (AX.25 Protocol, Version 2.0 only) in various parts of the HF spectrum.

7. This petition which is even more limiting in nature than RM-7248 a petition filed and withdrawn by the A.R.R.L. (American Radio Relay League) in 1990 after extensive comments were filed in opposition. [1]

8. The STA which has been in existence for a number of years has yet to be significantly concluded. The ARRL has argued repeatedly that further time for study is needed. It said in it's April 19, 1990 letter to Mr. Ralph A. Haller, Chief, Private Radio Bureau that the STA be extended "for additional periods in order to develop further experimental data on these same modes of communications." [2] This

11. The primary concern of automatic control is and remains three main problems (1) minimizing interference and using minimum power that is necessary to communicate (2) control of content of traffic that is passed automatically (third party, business, illegal) (3) insure against equipment malfunctions. The petitioners only address the last issue with a timer limitation, this is wholly inadequate.

12. The Amateur Radio service has always been and remains a self-policing, mainly de-regulated service. The Amateur community faced with automatic transmission of traffic to all parts of the world can no longer achieve this function.

13. This petition is fundamentally flawed in its limitation of experimentation, lack of control, and extreme frequency range of operation. The ability of the commission or any volunteer organization to effectively control, regulate, or police the activities of the wide spread automatic stations will be impossible.

III CONCLUSIONS

In summary, I suggest the following:

1. Amateur Radio needs absolute control over the traffic that it is carrying over the airwaves of the nation. There has been, and is now a great debate throughout the entire amateur community as to content in many, many messages now being sent via packet.
2. The petition (RM7681) as submitted is not required and is unduly restrictive on modes, not restrictive on technical standards nor on message content and should be rejected.
3. Full technical and administrative control of automatic digital operations are what the STA now in effect has demonstrated. This can only be done by a national organization and I would suggest the ARRL.
4. It is my opinion that this petition is not in the best interests of anyone and I urge the commission to deny and dismiss this petition.

Respectively submitted,



Jay W. Townsend

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April 18, 1991

APPENDIX

Footnotes

1. RM-7248 Comments and Reply's before the Commission March and April 1990 on the ARRL petition for automatic control of digital communications in the HF band.
2. Letter April 19, 1990 from Christopher D. Imlay, General counsel to the ARRL to Mr. Ralph A. Haller of the FCC requesting withdrawal of the petition of the ARRL for Automatic Control.
3. The RTTY Digital Journal January 1991. "Clover is Here" an article

CERTIFICATE OF SERVICE

I hereby certify this 18th day of April, 1991, that copies of this reply were served upon each of the petitioners referred to on page one, by U.S. Mail, postage pre-paid.


Jay W. Townsend